

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE CLEAN WATER NETWORK)	
and TENNESSEE SCENIC RIVERS)	
ASSOCIATION,)	No. 3:15-cv-00424
)	
Plaintiffs,)	Judge Waverly Crenshaw
)	
v.)	Magistrate Judge Holmes
)	
TENNESSEE VALLEY AUTHORITY,)	JURY DEMAND
)	
Defendant.)	

DECLARATION OF ANNE PASSINO

I, Anne Passino, being first duly sworn, do hereby state and affirm as follows:

1. I am an attorney with the Southern Environmental Law Center, counsel for Plaintiff Tennessee Scenic Rivers Association in the above matter. I make this declaration in support of Conservation Group's Motion to Compel. All facts and statements in this document are within my personal knowledge.

2. Attached hereto as collective **Exhibit A** is a true and correct copy of TVA Initial Disclosures (Oct. 28, 2015) and TVA Supplemental Disclosures (Apr. 5, 2016).

3. Attached hereto as collective **Exhibit B** is a true and correct copy of Conservation Groups' December 2015 requests for production, requests for admission, and interrogatories served on TVA in this matter and TVA's responses thereto.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of the draft transcript of the deposition of John Kammeyer.

5. Attached hereto as **Exhibit D** is a true and correct copy of a letter from Elizabeth Alexander, Southern Environmental Law Center, to David Ayliffe, Tennessee Valley Authority, dated May 13, 2016, which I received via e-mail.

6. Attached hereto as **Exhibit E** is a true and correct copy of a letter from David Ayliffe, Tennessee Valley Authority, to Counsel of Record, dated May 17, 2016, enclosing a discovery production, which I received via e-mail.

7. Attached hereto as collective **Exhibit G** is a true and correct copy of Conservation Groups' May 2015 requests for production, requests for admission, and interrogatories served on TVA in the State Action and TVA's responses thereto.

I declare under penalty of perjury that the foregoing is true and correct.

s/ Anne Passino
ANNE PASSINO
June 14, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Declaration was filed electronically on June 14, 2016, through the Court's Electronic Filing System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s Elizabeth A. Alexander
ELIZABETH A. ALEXANDER